

UNITED STATES DISTRICT COURT

for the

District of Oregon

United States of America
v.

CHARLIE LNU

Case No. 3:23-mj-00029

*Defendant(s)***CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 1, 2023 to Feb 24, 2023 in the county of Multnomah and elsewhere in the
District of Oregon, the defendant(s) violated:*Code Section*21 U.S.C. §§ 841(a)(1), (b)(1)(A)
(vi), and 846*Offense Description*Possession with intent to distribute controlled substances (fentanyl) and
conspiracy to possess with intent to distribute controlled substances (fentanyl)

This criminal complaint is based on these facts:

See affidavit of DEA, Special Agent Corey Shannahan which is attached and incorporated fully by reference

☒ Continued on the attached sheet.

/s/ Signed by Telephone

Complainant's signature

Corey Shannahan Special Agent, DEA

Printed name and title

Sworn to by telephone or other reliable means at 11:00 a.m. in accordance with Fed. R. Crim. P. 4.1

Date: 02/24/2023City and state: Portland, Oregon*Judge's signature*

JOLIE A. RUSSO, U.S. Magistrate Judge

Printed name and title

3:23-mj-00029

DISTRICT OF OREGON, ss:

AFFIDAVIT OF COREY SHANNAHAN

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Corey Shannahan being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am an investigative or law enforcement officer of the United States, within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. I have been employed as a Special Agent by the Drug Enforcement Administration (DEA) since January of 2022. My current assignment is at the Portland District Office where I am assigned to a DEA federal task force. My formal education includes a Bachelor of Arts in Finance. My formal law enforcement training includes successfully completing the 17-week DEA basic training course at the DEA academy in Quantico, Virginia, followed by 16 weeks of DEA field training in Portland, Oregon. During my field training, I participated in multiple drug investigations involving controlled purchase operations, interdiction, vehicle tracking, cell phone geo-location techniques, pen register/trap and trace orders, and Title III wiretaps. I have interviewed and operated informants, executed search warrants, arrested and interviewed subjects involved in the smuggling and distribution of narcotics, conducted physical surveillance, and utilized electronic and video surveillance. Prior to becoming a Special Agent, I investigated tax evasion and financial fraud for eight years while employed as a Revenue Agent for the Washington State Department of Revenue. I have also worked with and consulted numerous agents and law enforcement officers who have investigated drug trafficking offenses. As a Special Agent, I have participated in multiple drug investigations as either a case agent or as a supporting investigative agent, including in Title III wiretap

investigations. I am familiar with investigations of Drug Trafficking Organizations (hereinafter, “DTOs”), including identifying methods of importation and distribution of controlled substances, and how controlled substances are manufactured, consumed, packaged, marketed, smuggled, and distributed. I am also familiar with various tactics used by DTOs to import drugs into the United States, communicate with members of the DTOs, and arrange for transportation and distribution of drugs.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for **CHARLIE LNU** (“Last Name Unknown”), an unidentified Hispanic man who self identifies as “**CHARLIE**” (“**CHARLIE**”) for violations of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(vi), and 846: Possession with Intent to Distribute Controlled Substances (fentanyl).

3. This affidavit is intended only to show that there is sufficient probable cause for the requested arrest warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

Applicable Law

4. Title 21, United States Code, Section 841(a)(1), (b)(1)(A)(vi) and 846 make it illegal to possess with the intent to distribute a controlled substance, including more than 400 grams of a substance or mixture containing a detectable amount of fentanyl, or to conspire to do

so. Based on the facts from this investigation, these offenses carry a maximum sentence of up to life imprisonment, a fine of up to \$10 million, and a five-year term of supervised release.

Statement of Probable Cause

Background of the Investigation

5. The Drug Enforcement Administration, Portland District Office Group D-51, in conjunction with Homeland Security Investigations (HSI), and Tigard Police Department (TPD), (hereinafter collectively “Investigators”) are investigating a Drug Trafficking Organization (DTO) suspected of importing heroin, methamphetamine, cocaine, and fentanyl from Mexico into the United States for further distribution in Oregon and Washington.

6. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8. [REDACTED]

[REDACTED]

9. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11. To date, Investigators have indicted and/or arrested 10 DTO members and seized approximately 13.5 kilograms of powdered fentanyl (in powder and pill form), approximately 4.9 kilograms of heroin, approximately 3.5 kilograms of cocaine, approximately 3.2 kilograms of crystal methamphetamine, and 11 firearms.

12. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

[REDACTED]

13. From the investigation thus far, Investigators believe that unidentified Hispanic male referred to in intercepted communications as “CHARLIE” (“CHARLIE LNU” or “CHARLIE”) operates a dispatch style narcotics distribution cell operating primarily in the Portland Oregon area. A dispatch cells generally operates by drug customers calling an order number to place their drug order with the distributor and arrange for a meeting time and location for the agreed upon drug type and quantity to be delivered. The distributor then tasks a “runner” to deliver the drugs to the drug customer at the agreed upon location. Typically, bulk quantities of the drugs are stored at a separate location (drug stash house, storage facility or other premises) where larger quantities are broken down for sub-distribution for the “runner” to distribute to the DTO’s drug customers.

14. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17. [REDACTED]

[REDACTED]

[REDACTED]

18. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

20. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

21. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

22. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

*January 2023: [REDACTED] “CHARLIE” and “Tony”
Distribute Narcotics and are in Possession of Firearms*

24. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

25. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

26. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

27. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

28. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

30. On January 23, 2023, U.S. Magistrate Judge Jolie A. Russo in the District of Oregon, signed a search warrant (filed in U.S. District Court for Oregon Case No.: 3:23-MC-61) authorizing Investigators to search ZUINIGA's Room at the Budget Inn, the Nissan Altima, and the Nissan Sentra.

***January 24, 2023: Investigators Execute Search Warrant at Portland Budget Inn
Seize Narcotics and Firearms and Arrest Zuniga***

31. On January 24, 2023, Investigators executed the search warrant. Upon executing the search warrant, Investigators detained Zuniga without incident. While searching Zuniga's motel room, Investigators found a large cardboard box that had been tightly packaged. Inside investigators found eight firearms that had been concealed in speaker boxes and wrapped in foil. The firearms were packaged in a manner matching the intercepted communications that Investigators had reviewed previously where Zuniga and **CHARLIE** discussed concealing firearms this way.

32. During the search, Investigators found and seized the following items:
- Approximately 2,141.2 gross grams of a hard-rainbow-colored powdery substance packaged in numerous smaller bags weighing approximately one ounce each. Subsequent field tests for this substance indicated a presumptive positive for the presence of fentanyl. Approximately half of the powdered fentanyl was found in a green plastic bag beside the bed. The remaining half was found concealed inside of speakers which were packaged within large cardboard boxes recently wrapped in packaging tape.

- Approximately 417.2 gross grams of blue pills stamped M/30 packaged within multiple bags containing approximately 1,000 pills per bag. Subsequent field tests for the pills indicated a presumptive positive for the presence of fentanyl. The fentanyl pills were found within a green bag beside the bed.
- Approximately 393.0 gross grams of a clear crystalline substance packaged within multiple individual plastic bags. A subsequent field test for the substance returned a presumptive positive for the presence of crystal methamphetamine. The methamphetamine was found inside the same green plastic bag beside the bed.
- Approximately 49.2 gross grams of a white powdery substance individually packaged in small resealable plastic bags. A subsequent field test for the substance returned a presumptive positive for the presence of cocaine. The cocaine was found within a plastic big gulp cup located on a table located within the motel room.
- Nine firearms wrapped within tinfoil and clothing found within the same large cardboard boxes which appeared to have been recently wrapped in packaging tape.
- ZUNIGA's SP-8949 and another cellphone found on the bed inside of the motel room.

Below are images taken from the seizure:



Pictured above: one of the boxes found in the Budget Inn Motel room, the "Big Gulp" container where individually wrapped packages of cocaine were found



Pictured above: the green plastic bag containing powdered rainbow fentanyl, methamphetamine, and blue pills containing fentanyl



Pictured above: an example of how the firearms discovered in the cardboard box were wrapped in tin foil and clothing



Pictured above: all narcotics and firearms seized from the Budget Inn Motel

33. Investigators arrested Zuniga-Torres pursuant to an arrest warrant and complaint alleging possession with intent to distribute controlled substances and conspiracy in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A), and 846 (filed in 3:23-mj-15).

[REDACTED]

34. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

35. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

36. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

37. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

38. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

39. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

40. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

41. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

42. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

43. At [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

44. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

45. _____

A series of horizontal black bars of varying lengths, some solid and some with a slight 3D effect, arranged in a vertical sequence. The bars are of different heights and are positioned at irregular intervals, creating a sense of depth and movement. The overall composition is minimalist and abstract, with the black bars standing out against a white background.

47. [REDACTED]

[illegible]

48.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

49.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

50.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

51.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

52. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

53. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

54. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

55. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

56.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

57.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Conclusion

58. Based on the foregoing, I believe that **CHARLIE** has committed violations of the Target Offenses and has conspired with others to do so.

59. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Paul

Maloney, and AUSA Maloney advised me that in his opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant

Request for Sealing

60. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time is likely to seriously jeopardize the ongoing investigation. Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

/s/ Sworn to by telephone

In accordance with Fed. R. Crim. P. 4.1

Corey Shannahan
DEA Special Agent

Sworn to by telephone a 11:00 a.m. this 24 day of February 2023 in
accordance with Fed. R. Crim. P. 4.1.



HONORABLE JOLIE A. RUSSO
United States Magistrate Judge